

MARTIN F. TRIANO, ESQ. (SBN 98272)
ELAINE LE, ESQ. (SBN 277124)
LAW OFFICES OF TRIANO & BYRNE
2000 Center St., Suite 308
Berkeley, CA 94704
Telephone: (510) 548-8081
Fax: (510) 548-8096
Email: marty@trianobyrne.com
elaine@trianobyrne.com

Atorneys for Defendant METAQUOTES SOFTWARE CORP

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

WILLIAM WILBER et al.,) CASE No. SACV12 – 1448 AG
Plaintiffs,) (JPRX)
v.)
TOP GLOBAL CAPITAL, INC., et al.)
Defendants.)

Plaintiffs William Wilbur, Nicole Kharzi, Karen Oldmixon, Larry Cain, Robyn Jamison, Otto Fox, Gail Young, Mark Thomas, Cindy Dicosmio, Carol Winkler, and David Winkler (collectively “PLAINTIFFS”) and Defendant

1 **Metaquotes Software Corp (“MSC”) hereby agree by their respective counsel**
2 **to the following terms for a stipulation regarding discovery in the above case.**
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4 1. PLAINTIFFS and MSC agree that discovery in this proceeding will be as
5 described in the Federal Rules of Civil Procedure (“FRCP”) 33, 34, and 36
6 unless otherwise set forth within this stipulation.
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9 2. PLAINTIFFS and MSC agree that the procedure for Interrogatories to
10 Parties will be dictated by FRCP 33 unless otherwise indicated below:
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13 a. Parties agree that answers to each parties’ Set 1 of interrogatories will
14 be mutually exchanged on March 1, 2015.
15

16 b. Parties agree that any subsequent sets of interrogatories that will be
17 served will have an additional 10 days from the designated 30 days to
18 respond as dictated by FRCP 33.
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21 c. Parties agree to extend the limit of 25 interrogatories per party to 35
22 interrogatories per party.
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24

25 d. Parties agree that due to the number of plaintiffs involved in this
26 action, each interrogatory propounded in a single set of interrogatories
27 will be answered as it pertains to each individual PLAINTIFF. Thus,
28

1 each interrogatory shall be answered eleven (11) times each as it
2 pertains to individual PLAINTIFF.
3

4 e. Parties agree that any subpart of an interrogatory will not be deemed
5 as a separate interrogatory due to the number of plaintiffs and
6 defendants in this case.
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9 3. PLAINTIFFS and MSC agree that the procedure for Requests for Production
10 of Documents will be dictated by FRCP 34 unless otherwise indicated
11 below:
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14 a. Parties agree that answers to each parties' Set 1 of Request for
15 Production of Documents will be mutually exchanged on March 1,
16 2015.
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19 b. Parties agree that any subsequent sets of requests for production of
20 documents that will be served will have an additional 10 days from
21 the designated 30 days to respond as dictated by FRCP 34.
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24 4. PLAINTIFFS and MSC agree that the procedure for Requests for
25 Admissions will be dictated by FRCP 36 unless otherwise indicated below:
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1 a. Parties agree that if any initial set of request for admissions is served
2 on either party by Janaury 30, 2015, the response will be due on
3 March 1, 2015.

4
5 b. Parties agree that any sets of requests of admissions that will be
6 served after Januarry 30, 2015 will have an additional 10 days from
7 the designated 30 days to respond as dictated by FRCP 34.
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11 5. PLAINTIFFS and MSC reserve the right to further agree to modify this
12 stipulation and other FRCP rules regarding discovery in writing through out
13 the course of this action for the benefit of effective and efficient discovery.
14
15

16
17 Date: January 20, 2015

PHILLIPS LYTLE LLP

20 _____
21 /s/
22

ROBERT V. CORNISH JR.
Attorney for Plaintiffs

23 Date: January 21, 2015

LAW OFFICES OF TRIANO & BYRNE

25 _____
26 /s/
27

MARTIN F. TRIANO, ESQ.
Attorney for Defendant
METAQUOTES SOFTWARE CORP.

Upon review of the discovery stipulation filed by PLAINTIFFS and MSC on January 28, 2015, this Court hereby grants this Order approving the parties' Discovery Stipulation.

Date: February 3, 2015

jean rosenbluth

JEAN P. ROSENBLUTH
Magistrate Judge